

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SOUROVELIS, et al.	:	CIVIL ACTION
	:	
	:	
v.	:	
	:	
CITY OF PHILADELPHIA, et al.	:	NO. 14-CV-04687

MEMORANDUM OF LAW IN SUPPORT OF MOTION TO DISMISS

Defendants City of Philadelphia, Mayor Michael Nutter, and Commissioner Charles Ramsey (together “the City Defendants”) respectfully submit this memorandum in support of their motion to dismiss the complaint filed by Plaintiffs Christos Sourovelis, Doila Welch, and Norys Hernandez pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).

The City Defendants hereby, incorporate all factual and legal positions asserted in the Motion to Dismiss Plaintiffs’ Complaint, and accompanying memorandum of law, filed by Defendants R. Seth Williams and the Philadelphia District Attorney’s Office (together “the Commonwealth”). (ECF No. 27). For the reasons set forth in the Commonwealth’s Motion to Dismiss, Plaintiff’s complaint against the City Defendants should be dismissed.

Respectfully Submitted,

Date: October 2, 2014

/s/ Dimitrios Mavroudis
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